

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Walton and Rochester, Indiana))

MM Docket No. 92-192
RM-7960
RM-8036

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

REPLY COMMENTS

J.B. Ladd, by his counsel, hereby replies to the "Comments and Counterproposal of Dowagiac Broadcasting Company, Inc." and "Comments of Station WROI(FM)" in the above-captioned proceeding. In support, Mr. Ladd states as follows:

1. On August 26, 1992, the Commission released the Notice of Proposed Rule Making, 7 FCC Rcd 5486 (1992), alternately proposing the allotment of Channel 229A to Walton, Indiana, as its first local service as requested by Mr. Ladd, or the substitution of Channel 229A for Channel 221A at Rochester, Indiana, for Station WROI(FM) as requested by Dowagiac Broadcasting Company, Inc. ("DBC"), licensee of Station WDOV-FM, Dowagiac, Michigan. The DBC proposal was designed to eliminate an existing short spacing which would enable both stations,

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WDOW-FM and WROI(FM), to file applications for an increase to 6 kW effective radiated power.

2. In his comments, Mr. Ladd argued that the Commission's allotment priorities favor the provision of a first local service (Priority 3) at Walton over increases in secondary service (Priority 4) for the Dowagiac and Rochester stations. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982). Therefore, Mr. Ladd urged the Commission to grant the Walton allotment to provide him the opportunity to apply to provide local service as soon as possible.

3. In its comments, DBC asserted that the proposed substitution of channels at Rochester would better serve the public interest. DBC pointed to the elimination of existing short spacings at both stations resulting from the change in Class A spacings for 6 kW stations. As an alternative, DBC suggested the Commission consider the substitution of Channel 293A at Rochester which would allow WDOW-FM an increase to 6 kW.

4. Manitou Broadcasting Corporation and Bair Communications, Inc., assignor and assignee of Station WROI(FM) ("WROI"), Rochester, Indiana, jointly filed comments supporting DBC's proposal to allow both stations to increase to 6 kW power. WROI stated that Rochester has no other local station and is the largest community in Fulton County. WROI also stated that the additional power is needed to serve a larger portion of the county.

5. As to Walton, WROI suggested that Walton already receives service from nearby communities including Kokomo, Peru and Logansport, Indiana, with a total of seven commercial and two noncommercial educational stations. Furthermore, WROI speculated that nearby Grissom Air Force Base may restrict the location of the proposed station's transmitter site so as to avoid potential hazards to air navigation.

DISCUSSION

6. In the Second Report and Order in MM Docket 88-375, 4 FCC Rcd 6375, recons. 6 FCC Rcd. 3417 (1991), the Commission created the 6 kW Class A station on a selective basis. The Commission rejected the proposal of a blanket 6 kW power level for all Class A stations recognizing that due to grandfathered short spacings, not all Class A stations could increase. The Commission stated that it would entertain public interest showings as to how a particular increase in coverage area would benefit the public. However, on a comparative basis, the Commission has consistently held that a new first local service is preferred over the extension of coverage to secondary service areas provided by an increase in power to 6 kW. See e.g., Belvidere, New Jersey, 6 FCC Rcd 1333 (1991); Lafayette, Tennessee, 6 FCC Rcd 3289 (1991); Homerville, Lakeland and Statenville, Georgia, 6 FCC Rcd 5802 (1991). The fact that two stations instead of one stand to benefit does not alter the analysis. See Northwye, Missouri, et al., 7 FCC Rcd 1449 (1992).

7. As for the number of reception services in the Walton area, the opponents fail to demonstrate how many reception services actually cover Walton. Nevertheless, such a showing would be irrelevant because these stations would have no primary obligation to serve the needs of Walton's residents. The Commission's longstanding policy is that reception services are no replacement for a first local transmission service. See Clinton, Georgia, 45 RR 2d 1587 (1979); Westover and Grafton, West Virginia, 46 FR 10737 (1981); Conklin, New York, 5 FCC Rcd 1104 (1990).

8. As to the concerns expressed by WROI that Grissom Air Force Base may have restrictions which could affect the location of a Walton transmitter site, WROI is clearly speculating. WROI has provided no documentation from a Grissom Air Force Base official nor from an aeronautical consultant substantiating its concerns. On the other hand, Mr. Ladd has had conversations with Grissom Air Force Base officials and has received no such adverse reactions.

9. To assuage Commission concerns, Mr. Ladd's engineering consultant, Paul Dean Ford, studied the available site area for Channel 229A and found that there is a large non-short spaced area extending from the proposed Walton site coordinates (3 miles west) to a location as far as 15 kilometers (approximately 10 miles) to the northwest of the Grissom runway in which to locate a suitable transmitter site and still provide Walton with

a 70 dBu signal. See attached Engineering Statement. Mr. Ford selected an arbitrary site 15 kilometers from Grissom and ran a channel study from that location. The study reveals no short spacing.

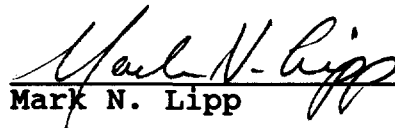
10. Mr. Ladd is not requesting the Commission to alter the original coordinates for his proposal. The purpose of supplying information on a new site location is to demonstrate the flexibility of the large site area in which Channel 229A can be applied for and avoid any possible concerns that Grissom Air Force Base officials may have. As stated earlier, Mr. Ladd has discussed this matter with Grissom officials and is unaware of any concerns with the Walton site being three miles from the Air Force Base.

Accordingly, J.B. Ladd respectfully urges the Commission to allot Channel 229A to Walton as its first local service.

Respectfully submitted,

J.B. LADD

By:


Mark N. Lipp

Mullin, Rhyne, Emmons and Topel, P.C.
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Washington, D.C. 20036
(202) 659-4700

His Counsel

November 3, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

J. B. Ladd

Req. Allotment of FM Channel

229A to Walton, Indiana

November, 1992

Disclaimer

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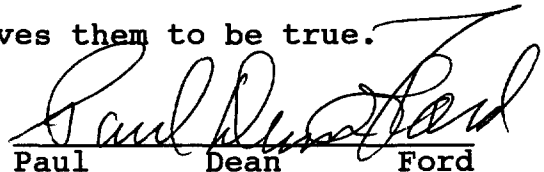
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Affidavit and Engineering Statement (continued).....


The attached portion of a Chicago Sectional Aeronautical Chart shows the location of Grissom Air Force Base and the site shown herein. Line-of-sight occurs to Walton, IN from this site.

The attached FM Channel Study from Dataworld, Inc. shows that it is possible to locate a Walton, IN transmitter site approximately 15 kilometers from the Grissom Air Force Base, meet all required channel spacings; except for the mutually exclusive Rochester, IN proposal; and still place a city grade signal over the entire community of Walton, IN. The site shown herein is located about 4 kilometers east of an existing 341 foot AGL tower.

Paul Dean Ford, being first duly sworn upon oath, deposes and says that he is a Consulting Engineer at West Terre Haute, Indiana; Registered as a Professional Engineer in the State of Indiana; that he has been retained by J. B. Ladd to prepare this engineering statement; that all facts contained therein are true of his own knowledge, except where stated to be on information or belief, and as to those facts, he believes them to be true.


Paul Dean Ford

Subscribed and sworn to before me this 2nd day of November, 1992.


Eleanor J. Ford, Notary Public,
State of Indiana, County of Vigo

My commission expires August 7th, 1995.

FM Spacing Study

Job title: J. B. LADD
Channel 229A
FM Translators excluded.
Coordinates: 40-46-00 86-16-00
Safety zone: 75 km (46 miles).

This study utilized a copy of the Dataworld and FCC database. Paul Dean Ford believes this information to be accurate and current; however, he does not assume any responsibility for any erroneous or incomplete data furnished as part of these databases.

FM Spacing study

Title: J. B. LADD
Channel 229A (93.7 MHz)
Database: DW 11/02/92

Latitude: 40-46
Longitude: 86-16-00
Safety zone: 75 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WKLK	LIC	HORIZON BROADCASTING INC	226B	12.6	39-46-03	168.5	113.2	69
INDIANAPOLIS	IN	BMLH-910503KB	93.1	312	86-00-12	348.7	44.19	CLEAR
License Granted 12/13/91 per FCC release #21279 dated 12/19/91; Was WEAG 08/14/87; Ant: Elec. Res. Inc. SHP-2AE; Affiliated with WIBC(AM)								
WBTU	LIC	FORT WAYNE MEDIA LIMITED	227B	50	41-23-55	50.1	110.4	69
KENDALLVILLE	IN	BLH-850806KA	93.3	150	85-15-08	230.8	41.42	CLEAR
Affiliated with WAWK(AM)								
WKHY	LIC	U.S. BROADCASTING, INC.	228A	3	40-23-13	234.8	72.93	72
LAFAYETTE	IN		93.5	66	86-58-10	54.3	.932	CLOSE
Was WXUS 11/19/87								
WKHY	APP	U.S. BROADCASTING, INC.	228A	3	40-23-13	234.8	72.93	72
LAFAYETTE	IN	BPH-920427IF	93.5	75	86-58-10	54.3	.932	CLOSE
Received per FCC release #15261 dated 05/12/92, accepted per 15262 dated 05/13/92; Was WXUS 11/19/87								
WWWO	LIC	VIKING COMMUNICATIONS IN	228A	1.55	40-25-16	118.2	80.72	72
HARTFORD CITY	IN	BLH-880129KC	93.5	139	85-25-40	298.8	8.719	CLOSE
WWWO	CP	VIKING COMMUNICATIONS IN	228A	3.04DA	40-25-16	118.2	80.72	72
HARTFORD CITY	IN	BPH-900823IB	93.5	139	85-25-40	298.8	8.719	CLOSE
CP Granted 04/22/91 per FCC release #21102 dated 04/26/91; Was WVBH 10/02/89								
NEW	APP	U.S.A. DIGITAL RADIO, LP	228	6	40-06-26	246.3	178.6	
URBANA	IL	920810MF	93.5	41	88-11-12	65.1		
Received per FCC release #15333 dated 08/21/92; EXPERIMENTAL FM STATION								
PRM		PROPOSED RULE MAKING	229A		40-40-45	154.2	10.80	115
WALTON		IN DOC-92-192	93.7		86-12-39	334.2	-104	SHORT
PRM adopted 07/30/92, released 08/26/92; RM-7960; SITE RESTRICTION 2 MI NE								
PRM		PROPOSED RULE MAKING	229A		41-03-02	.9	31.53	115
ROCHESTER		IN DOC-92-192	93.7		86-15-39	180.9	-83.5	SHORT
PRM adopted 07/30/92, released 08/26/92; RM-8036								
WQKC	CP	S.C.I. BROADCASTING, INC	229B	25	38-58-22	177.5	199.4	178
SEYMOUR		IN BMPH-920225IE	93.7	213	86-10-03	357.6	21.36	CLEAR
CP Granted 04/03/92 per FCC release #21355 dated 04/10/92; Application for License (BLH-920803KC) accepted per FCC release #15326 dated 08/12/92; Was WZZB 05/24/91 per FCC release #158 dated 05/17/91; Ant: Elec. Res. Inc. FML-6AC; Affiliated with WZZB(AM)								

Paul Dean Ford
West Terre Haute, Indiana
FM Spacing study

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November 2, 1992

Title: J. B. LADD
Channel 229A (93.7 MHz)
Call Auth Licensee name Chan ERP-kW Latitude Br-to Dist. Req.
City of License St FCC File no. Freq EAH-m Longitude -from (km) (km)

WQKC LIC S.C.I. BROADCASTING INCO 229B1 10 38-58-33 170.7 201.4 143
SEYMOUR IN BMLH-900220KG 93.7 58 85-53-21 350.9 58.44 CLEAR
License Granted 12/19/90 per FCC release #21016 dated 12/24/90; Was WZZB 05/24/91 per FCC release #158 dated 05/17/91; Affiliated with WZZB(AM)

WFCJ LIC MIAMI VALLEY CHRISTIAN B 229B 50 39-39-36 125.9 206.7 178
MIAMISBURG OH BLH-870514KA 93.7 150 84-18-50 307.2 28.73 CLEAR

WBCT LIC RADIO ASSOCIATES OF MICH 229B 320 42-37-56 16.0 215.9 178
GRAND RAPIDS MI 93.7 238 85-32-16 196.5 37.90 CLEAR
Was WJFM 07/31/92 per FCC release #188 dated 07/31/92

WXTZ CP WEISS BCG OF NOBLESVILLE 230A 3 39-59-32 171.1 87.05 72
NOBLESVILLE IN BPH-880301MQ 93.9 100 86-06-27 351.2 15.05 CLOSE
CP Granted 12/20/91 per FCC release dated 01/15/92; Hearing DOC-90-94, adopted 02/22/90, released 03/26/90; Call Granted 09/25/92 FCC release #192 10/09/92

WLIT-FM LIC WLIT INC SUB 19 INCORPOR 230B 4 41-52-44 317.7 168.5 113
CHICAGO IL BLH-830301AG 93.9 482 87-38-10 136.8 55.53 CLEAR
Was WLAK 01/16/89

WQTX CP JUDITH A SELBY 231A 6DA 40-58-51 73.7 86.51 31
ROANOKE IN BMPH-890711IC 94.1 100 85-16-48 254.3 55.51 CLEAR
CP Granted 02/11/92 per FCC release #21317 dated 02/18/92; Was WHOR 12/04/89

WGFA-FM LIC IROQUOIS COUNTY BROADCASTS 231B 26 40-47-48 272.0 125.5 69
WATSEKA IL BLH-860902KC 94.1 112BT 87-45-11 91.0 56.52 CLEAR
Affiliated with WGFA(AM)

WNZE LIC NOVA BROADCASTING INCORP 232A 3 41-19-06 356.5 61.38 31
PLYMOUTH IN 94.3 67 86-18-41 176.5 30.38 CLEAR
Deletion proposed; ORDERED TO 232B1; Affiliated with WTCA(AM)

WNZE CP NOVA BROADCASTING INCORP 232B1 11.3 41-31-41 .1 84.56 48
PLYMOUTH IN BPH-910308IA 94.3 150 86-15-53 180.1 36.56 CLEAR
CP Granted 07/29/91 per FCC release #21177 dated 08/02/91; ORDERED FROM 232A; Affiliated with WTCA(AM)

WJMK LIC INFINITY BCG CORP OF ILL 282B 4.10 41-52-44 317.7 168.5 15
CHICAGO IL BLH-870506KJ 104.3 480 87-38-10 136.8 153.5 CLEAR
Affiliated with WJJD(AM)

WAJC LIC BUTLER UNIVERSITY *283B 40 39-50-25 175.7 103.2 15
INDIANAPOLIS IN BLED-920311KB 104.5 150 86-10-34 355.8 88.15 CLEAR
License Granted 07/16/92 per FCC release #21425 dated 07/21/92; Ant: Jampro JS CP-10

>> End of channel 229A study <<

Paul Dean Ford
West Terre Haute, Indiana
FM Spacing study

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November 2, 1992

Title: J. B. LADD

Channel 229A (93.7 MHz)

Database: FCC 09/28/92

Latitude: 40-46

Longitude: 86-16-00

Safety zone: 75 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

ALLOC			226B		39-46-03	168.5	113.2	69
Indianapolis	IN		93.1		86-00-12	348.7	44.19	CLEAR
Coordinates updated from LIC record			BLH850320KK					

WKLR	LIC	Horizon Broadcasting, In	226B	12.5	39-46-03	168.5	113.2	69
Indianapolis	IN	BMLH-910503KB	93.1	312	86-00-12	348.7	44.19	CLEAR

ALLOC			227B		41-23-55	50.1	110.4	69
Kendallville	IN		93.3		85-15-08	230.8	41.42	CLEAR
Coordinates updated from LIC record			BLH850806KA					

WBTU	LIC	FORT WAYNE MEDIA LIMITED	227B	50	41-23-55	50.1	110.4	69
Kendallville	IN	BLH-850806KA	93.3	150	85-15-08	230.8	41.42	CLEAR

ALLOC			228A		40-23-13	234.8	72.93	72
Lafayette	IN		93.5		86-58-10	54.3	.932	CLOSE
Coordinates updated from LIC record			BLH860127KB					

WKHY	LIC	U.S. Broadcasting, Inc.	228A	3	40-23-13	234.8	72.93	72
Lafayette	IN	BLH-860127KB	93.5	66	86-58-10	54.3	.932	CLOSE

WKHY	APC	U.S. Broadcasting, Inc.	228A	3	40-23-13	234.8	72.93	72
Lafayette	IN	BPH-920427IF	93.5	75	86-58-10	54.3	.932	CLOSE

ALLOC			228A		40-25-16	118.2	80.72	72
Hartford City	IN		93.5		85-25-40	298.8	8.719	CLOSE
Coordinates updated from LIC record			BLH880129KC		Proposed to Canada as B1 on 910128-Accepted by Canada 910415			

WWWO	LIC	Viking Communications, I	228A	1.55	40-25-16	118.2	80.72	72
Hartford City	IN	BLH-880129KC	93.5	139	85-25-40	298.8	8.719	CLOSE
Proposed to Canada as B1 on 910128-Accepted by Canada 910415								

WWWO	CP	Viking Communications, I	228A	3DA	40-25-16	118.2	80.72	72
Hartford City	IN	BPH-900823IB	93.5	139	85-25-40	298.8	8.719	CLOSE
ERP/HAAT combination exceeds value for international agreements Proposed to Canada as B1-Accepted by Canada 910415 DA: oddball ODD900823IB @ 0 deg								

PRM	ADD	J.B. Ladd	229A		40-40-45	154.2	10.80	115
Walton	IN	DOC-92-192	93.7		86-12-39	334.2	-104	SHORT
Canadian Concurrence Required-Proposed to Canada as B1 on 920408-Accepted by; Canada on 920615 PRM-Site Restricted 3.1 km Northeast								

PRM	ADD	Dowagiac Broadcasting Co	229A		41-03-02	.9	31.53	115
Rochester	IN	DOC-92-192	93.7		86-15-39	180.9	-83.5	SHORT
PRM-Reconsideration								

FM Spacing study

Title: J. B. LADD
Channel 229A (93.7 MHz)

Latitude: 40-46
Longitude: 86-16-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of	License	St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WQKC	CP	S.C.I. Broadcasting, Inc	229B	25	38-58-22	177.5	199.4	178
Seymour		IN BMPH-920225IE	93.7	213	86-10-03	357.6	21.36	CLEAR
WQKC	LIC	S.C.I. Broadcasting, Inc	229B1	10	38-58-33	170.7	201.4	143
Seymour		IN BLH-7272	93.7	58	85-53-21	350.9	58.44	CLEAR
ALLOC			229B		38-58-33	170.7	201.4	178
Seymour		IN	93.7		85-53-21	350.9	23.44	CLEAR
Coordinates updated from LIC record			BLH7272					
PRM	ADD	Livingston County Broadc	229B1		40-48-00	271.8	205.4	143
Pontiac		IL DOC-92-204	93.7		88-42-00	90.2	62.44	CLEAR
PRM-Counterproposal								
ALLOC			229B		39-39-36	125.9	206.7	178
Miamisburg		OH	93.7		84-18-50	307.2	28.73	CLEAR
Coordinates updated from LIC record			BLH870514KA					
WFCJ	LIC	Miami Valley Christian B	229B	50	39-39-36	125.9	206.7	178
Miamisburg		OH BLH-870514KA	93.7	150	84-18-50	307.2	28.73	CLEAR
WBCT	LIC	Radio Associates of Mich	229B	320	42-37-56	16.0	215.9	178
Grand Rapids		MI BLH-800616AK	93.7	238	85-32-16	196.5	37.90	CLEAR
GRANDFATHERED AT 320KW @ 238M HAAT.								
ALLOC			229B		42-37-56	16.0	215.9	178
Grand Rapids		MI	93.7		85-32-16	196.5	37.90	CLEAR
Coordinates updated from LIC record			BLH800616AK					
ALLOC			230A		40-03-12	164.7	82.11	72
Noblesville		IN DOC-84-231	93.9		86-00-42	344.9	10.11	CLOSE
Filing window 01/19-03/01/88 **CLOSED** ; # 50								
NEW	APC	Bible Broadcasting Netwo	230A	2	40-00-55	163.9	86.85	72
Noblesville		IN BPH-880301ML	93.9	122	85-58-58	344.0	14.85	CLOSE
DOC-90-94; Cut-off 12/09/88; Initial Decision to Deny; Pet for Leave to Amend & Amendment 910503 Accepted & App Denied Per Initial Decision Released 910619-Decision Affirmed by review board rel 920115								
NEW	APC	Broadcast Communications	230A	3	40-00-55	163.9	86.85	72
Noblesville		IN BPH-880301MZ	93.9	100	85-58-58	344.0	14.85	CLOSE
DOC-90-94; Cut-off 12/09/88; Initial Decision to Deny; Amended 891113-App Denied Per Initial Decision Released 910619-Decision Affirmed by review board rel 920115-Amended 911011								

Paul Dean Ford
West Terre Haute, Indiana
FM Spacing study

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November 2, 1992

Title: J. B. LADD
Channel 229A (93.7 MHz)

Latitude: 40-46
Longitude: 86-16-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
NEW	APC	Ben L. Umberger	230A	3	40-00-55	163.9	86.85	72
Noblesville	IN	BPH-880301PD	93.9	100	85-58-58	344.0	14.85	CLOSE
DOC-90-94; Cut-off 12/09/88; Initial Decision to Deny; App Denied Per Initial Decision Released 910619-Decision Affirmed by review; board rel 920115								
NEW	APC	Weiss B/Casting of Noble	230A	3	39-59-32	171.1	87.05	72
Noblesville	IN	BPH-880301MQ	93.9	100	86-06-27	351.2	15.05	CLOSE
DOC-90-94; Cut-off 12/09/88; Initial Decision to Grant; Pet for Leave to Amend & Amendment 910517 Accepted & App Denied Per Initial Decision Released 910619-Decision Affirmed by review board rel 920115								
ALLOC			230B		41-52-44	317.7	168.5	113
Chicago	IL		93.9		87-38-10	136.8	55.53	CLEAR
Coordinates updated from LIC record BLH830301AG								
WLIT-FM LIC	Viacom	Broadcasting Inc.	230B	4	41-52-44	317.7	168.5	113
Chicago	IL	BLH-830301AG	93.9	482	87-38-10	136.8	55.53	CLEAR
ALLOC			231A		40-55-00	76.0	70.18	31
Roanoke	IN	DOC-88-284	94.1		85-27-30	256.5	39.18	CLEAR
Effective 4-11-91-Rsvd for WQTX per D88-284								
WQTX	CP	Judith A. Selby	231A	6DA	40-58-51	73.7	86.51	31
Roanoke	IN	BPH-890711IC	94.1	100	85-16-48	254.3	55.51	CLEAR
ERP exceeds maximum allowed under international agreement-Proposed to Canada as B1 on 911011-Accepted by Canada on 911107 DA: oddball ODD890711IC @ 0 deg								
WGFA-FM LIC	Iroquois	County Broadcas	231B	26	40-47-48	272.0	125.5	69
Watseka	IL	BLH-860902KC	94.1	112	87-45-11	91.0	56.52	CLEAR
ALLOC			231B		40-47-48	272.0	125.5	69
Watseka	IL		94.1		87-45-11	91.0	56.52	CLEAR
Coordinates updated from LIC record BLH860902KC								
WNZE	LIC	Community Service Broadc	232A	3	41-19-06	356.5	61.38	31
Plymouth	IN	BLH-5368	94.3	67	86-18-41	176.5	30.38	CLEAR
*To Channel 232B1 per D90-203; Class B1 with respect to Canada								
ALLOC			232B1		41-30-18	358.6	82.02	48
Plymouth	IN	DOC-90-203	94.3		86-17-25	178.6	34.02	CLEAR
Site restricted-Effective 7-1-91-Reserved for WNZE per D90-203								
WNZE	CP	Community Service Broadc	232B1	11.5	41-31-41	.1	84.56	48
Plymouth	IN	BPH-910308IA	94.3	150	86-15-53	180.1	36.56	CLEAR
From Channel 232A Per D90-203								

FM Spacing study

Title: J. B. LADD
Channel 229A (93.7 MHz)

Latitude: 40-46
Longitude: 86-16-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WNZE	APC	Community Service Broadc	232B1	11.5	41-32-00	359.5	85.15	48
Plymouth	IN	BMPH-920226IC	94.3	150	86-16-36	179.4	37.15	CLEAR
From Channel 232A Per D90-203-Application Dismissed 920623								
WJMK	LIC	Infinity B/C Corp. of IL	282B	4.10	41-52-44	317.7	168.5	15
Chicago	IL	BLH-870506KJ	104.3	480	87-38-10	136.8	153.5	CLEAR
ALLOC			283B		39-50-37	175.5	102.8	15
Indianapolis	IN		104.5		86-10-19	355.6	87.81	CLEAR
Coordinates updated from LIC record BLED791129AF								

>> End of channel 229A study <<

Proposed Walton, IN
 3 second Terrain Data from EDX Engineering, Inc.
 DISTANCES TO CONTOURS (Kilometers):
 Site: 40,46,0,86,16,0
 Frequency: 93.7000 MHz, 229A
 Prepared November 2, 1992
 F(50,50) Curves Number of Contours: 1

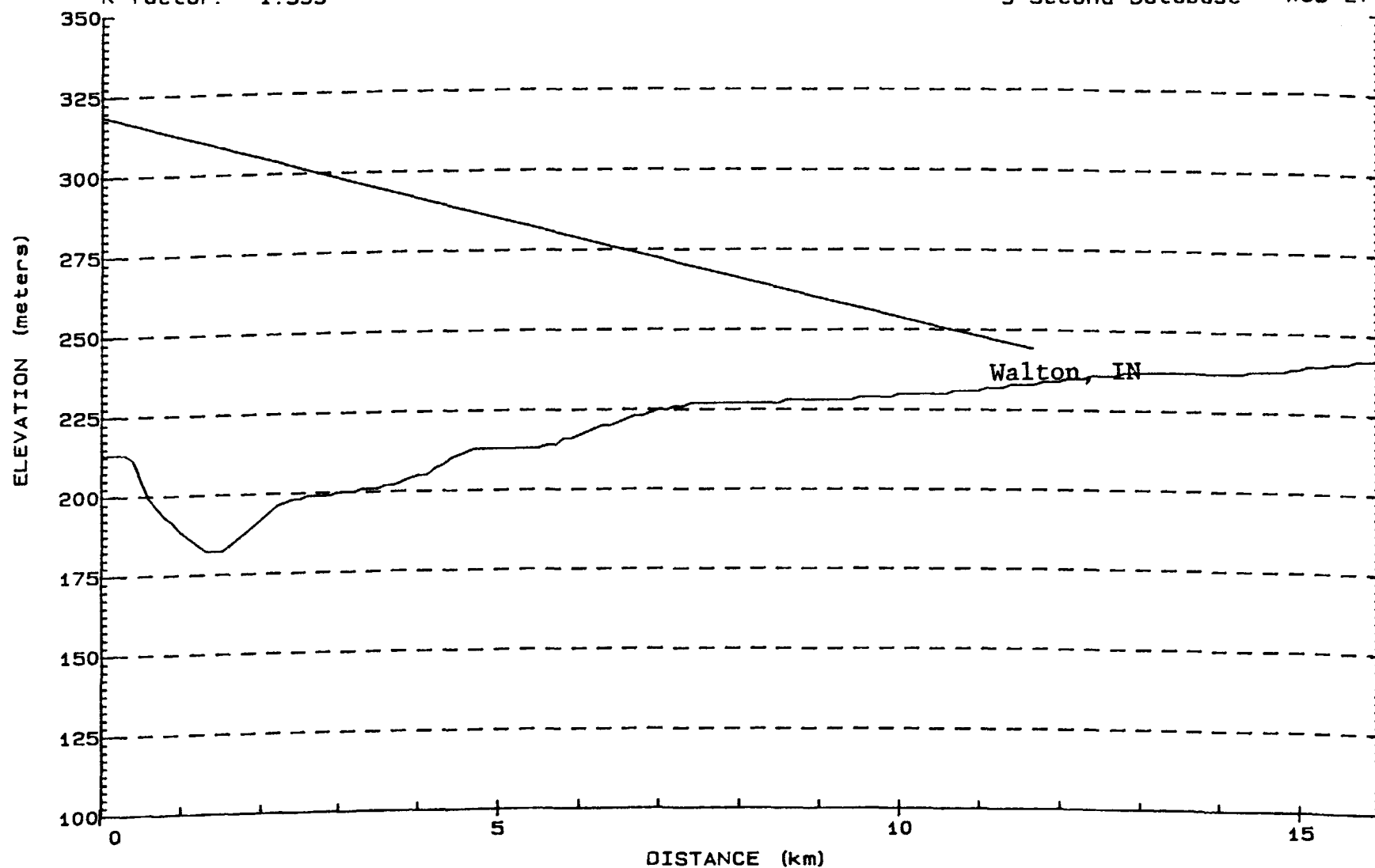
AZ (deg)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 70.0
.0	85	7.78	14.9
45.0	95	7.78	15.7
90.0	112	7.78	17.2
135.0	99	7.78	16.0
*169.6	92	7.78	15.5
180.0	93	7.78	15.6
225.0	109	7.78	16.9
270.0	118	7.78	17.6
315.0	90	7.78	15.3

*city radial through Walton, IN

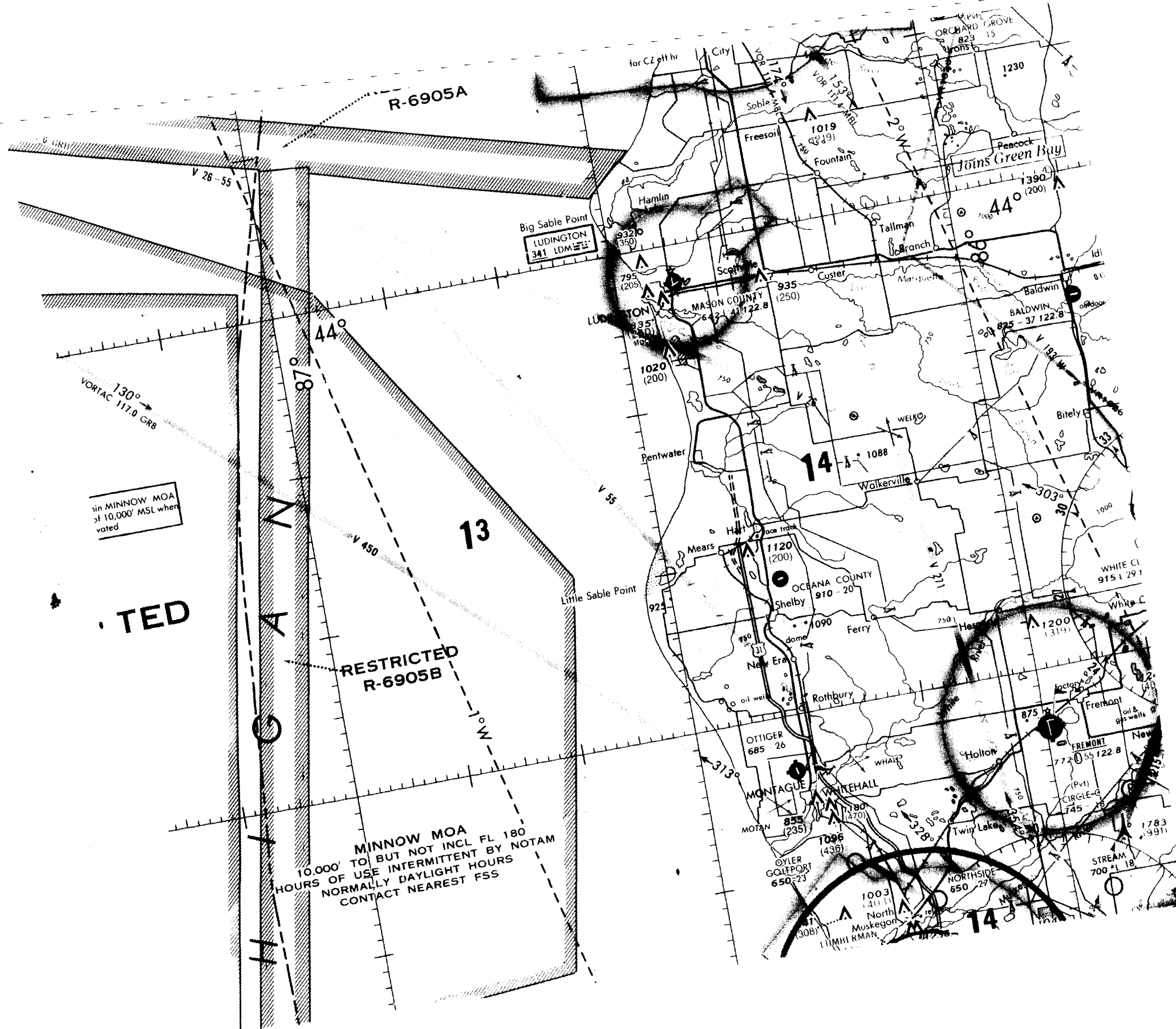
Average of 8 standard radials is 100
 meters antenna HAAT

Walton, IN is located 11.67 kilometers
 from the site shown herein at a true angle
 of 169.6 degrees.

Transmitter coords: 40 46 0 86 16 0 Azimuth: 169.60 degs. Receiver Distance: 11.7 km
 Frequency: 93.7 MHz Transmitter Elevation: 318.8 m Receiver Elevation: 244.1 m
 Number of Obstacles: 0 Obstacle Loss: 2.3 dB Total Path Loss: 95.5 dB
 K factor: 1.333 3 Second Database - WGS 27



Profile through Walton, IN



R-6905A

Big Sable Point
LUDINGTON
341 LDM

MINNOW MOA
of 10,000' MSL when
voted

TED

RESTRICTED
R-6905B

MINNOW MOA
10,000' TO BUT NOT INCL FL 180
HOURS OF USE INTERMITTENT BY NOTAM
NORMALLY DAYLIGHT HOURS
CONTACT NEAREST FSS

13

14

14

1230

1390

122.8

915

875

772

1003

1783

1019

935

1020

1120

1180

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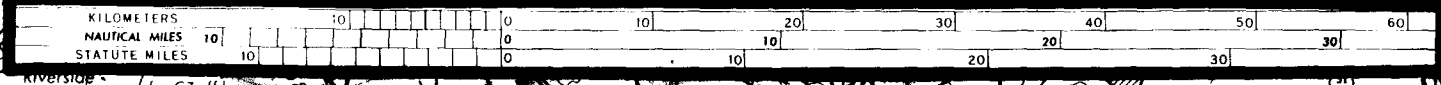
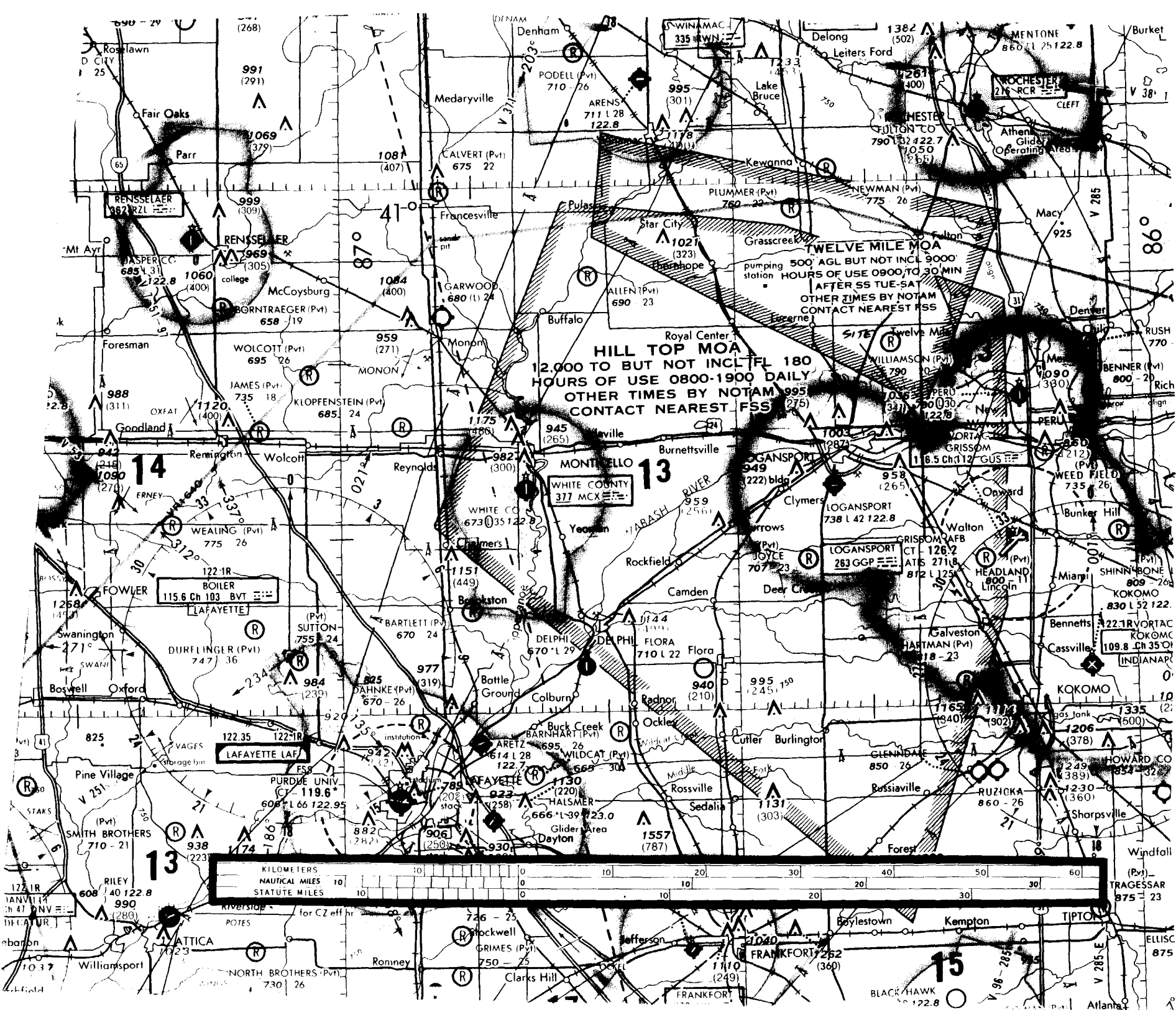
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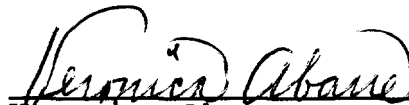
CERTIFICATE OF SERVICE

I, Veronica Abarre, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., do hereby certify that I have this 3rd day of November, 1992, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Reply Comments" to the following:

* Nancy V. Joyner
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* Hand Delivered